

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEONTE JAMES, Plaintiff, v. CUYAHOGA COUNTY, et al., Defendants.	Case No. 1:21-cv-1958 Judge J. Philip Calabrese Magistrate Judge Jonathan D. Greenberg
CUYAHOGA COUNTY’S SUPPLEMENTAL ANSWERS TO FIRST SET OF REQUESTS FOR ADMISSIONS TO DEFENDANT CUYAHOGA COUNTY	

Subject to and without waiving the objections set forth in the County’s original and supplemental response to First Set of Request for Admissions to Defendant Cuyahoga County (“County”) provides the following supplemental Answers to Plaintiff’s Request for Admissions:

REQUESTS

1. Admit that body-worn-camera video of the August 5, 2018 incident involving inmate Muhammed Abdulhagg (Inmate #0236463) documented in the incident report beginning on CC 3578 does not exist within Defendant Cuyahoga County’s possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County’s Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

2. Admit that surveillance-camera video of the August 5, 2018 incident involving inmate Muhammed Abdulhagg (Inmate #0236463) documented in the incident report beginning

on CC 3578 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

3. Admit that body-worn-camera video of the August 4, 2018 incident involving inmate Terrell Bell (Inmate #0328416) documented in the incident report beginning on CC 3558 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

4. Admit that surveillance-camera video of the August 4, 2018 incident involving inmate Terrell Bell (Inmate #0328416) documented in the incident report beginning on CC 3558 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

5. Admit that body-worn-camera video of the August 6, 2018 incident involving inmate Deante Benjamin (Inmate #0206625) documented in the incident report beginning on CC 3401 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

6. Admit that surveillance-camera video of the August 6, 2018 incident involving inmate Deante Benjamin (Inmate #0206625) documented in the incident report beginning on CC 3401 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

7. Admit that body-worn-camera video of the December 30, 2018 incident involving inmate Antoine Blackshear (Inmate #0186338) documented in the incident report beginning on CC 5566 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

8. Admit that surveillance-camera video of the December 30, 2018 incident involving inmate Antoine Blackshear (Inmate #0186338) documented in the incident report beginning on CC 5566 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

9. Admit that body-worn-camera video of the August 7, 2018 incident involving inmate Anthony Bonner (Inmate #0212328) documented in the incident report beginning on CC 3398 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

10. Admit that surveillance-camera video of the August 7, 2018 incident involving inmate Anthony Bonner (Inmate #0212328) documented in the incident report beginning on CC 3398 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/ or control over the above-referenced surveillance camera video.

11. Admit that body-worn-camera video of the March 9, 2018 incident involving inmate Colin Brady (Inmate #0327112) documented in the incident report beginning on CC 4693 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

12. Admit that surveillance-camera video of the March 9, 2018 incident involving inmate Colin Brady (Inmate #0327112) documented in the incident report beginning on CC 4693 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County

admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

13. Admit that body-worn-camera video of the July 24, 2018 incident involving inmate Jamar Brown (Inmate #0283968) documented in the incident report beginning on CC 3355 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

14. Admit that surveillance-camera video of the July 24, 2018 incident involving inmate Jamar Brown (Inmate #0283968) documented in the incident report beginning on CC 3355 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

15. Admit that body-worn-camera video of the August 6, 2018 incident involving inmate Shauntez Brown (Inmate #0331391) documented in the incident report beginning on CC 3417 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

16. Admit that surveillance-camera video of the August 6, 2018 incident involving inmate Shauntez Brown (Inmate #0331391) documented in the incident report beginning on CC 3417 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

17. Admit that body-worn-camera video of the December 15, 2017 incident involving inmate Joshua Castleberry (Inmate #0326936) documented in the incident report beginning on CC 3869 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

18. Admit that surveillance-camera video of the December 15, 2017 incident involving inmate Joshua Castleberry (Inmate #0326936) documented in the incident report beginning on CC 3869 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

19. Admit that body-worn-camera video of the September 6, 2018 incident involving inmate Marvel Collins (Inmate #0326691) documented in the incident report beginning on CC 3650 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

20. Admit that surveillance-camera video of the September 6, 2018 incident involving inmate Marvel Collins (Inmate #0326691) documented in the incident report beginning on CC 3650 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

21. Admit that body-worn-camera video of the December 21, 2018 incident involving inmate Gabrielle Conway (Inmate #0290789) documented in the incident report beginning on CC 5648 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

22. Admit that surveillance-camera video of the December 21, 2018 incident involving inmate Gabrielle Conway (Inmate #0290789) documented in the incident report beginning on CC 5648 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

23. Admit that body-worn-camera video of the October 5, 2018 incident involving inmate Joselito Dejesus (Inmate #0218586) documented in the incident report beginning on CC

4350 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

24. Admit that surveillance-camera video of the October 5, 2018 incident involving inmate Joselito Dejesus (Inmate #0218586) documented in the incident report beginning on CC 4350 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

25. Admit that body-worn-camera video of the June 6, 2019 incident involving inmate Kevin Eskeridge (Inmate #0147255) documented in the incident report beginning on CC 3756 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

26. Admit that surveillance-camera video of the June 6, 2019 incident involving inmate Kevin Eskeridge (Inmate #0147255) documented in the incident report beginning on CC 3756 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny as possible match has been produced.

27. Admit that body-worn-camera video of the March 13, 2018 incident involving inmate Feliks Goldshtein (Inmate #0299412) documented in the incident report beginning on CC 4742 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

28. Admit that surveillance-camera video of the March 13, 2018 incident involving inmate Feliks Goldshtein (Inmate #0299412) documented in the incident report beginning on CC 4742 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/ or control over the above-referenced surveillance camera video.

29. Admit that body-worn-camera video of the October 26, 2017 incident involving inmate William Graves (Inmate #0278879) documented in the incident report beginning on CC 5680 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

30. Admit that surveillance-camera video of the October 26, 2017 incident involving inmate William Graves (Inmate #0278879) documented in the incident report beginning on CC 5680 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

31. Admit that body-worn-camera video of the June 28, 2019 incident involving inmate Aaron Gregory (Inmate #0297844) documented in the incident report beginning on CC 5179 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

32. Admit that surveillance-camera video of the June 28, 2019 incident involving inmate Aaron Gregory (Inmate #0297844) documented in the incident report beginning on CC 5179 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

33. Admit that body-worn-camera video of the July 12, 2019 incident involving inmate Marcus Griffin (Inmate #0336207) documented in the incident report beginning on CC 5194 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

34. Admit that surveillance-camera video of the July 12, 2019 incident involving inmate Marcus Griffin (Inmate #0336207) documented in the incident report beginning on CC 5194 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

35. Admit that body-worn-camera video of the July 4, 2019 incident involving inmate Marcus Griffin (Inmate #0336207) documented in the incident report beginning on CC 5237 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

36. Admit that surveillance-camera video of the July 4, 2019 incident involving inmate Marcus Griffin (Inmate #0336207) documented in the incident report beginning on CC 5237 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

37. Admit that body-worn-camera video of the March 24, 2018 incident involving inmate Deonte Hamilton (Inmate #0292567) documented in the incident report beginning on CC 4873 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

38. Admit that surveillance-camera video of the March 24, 2018 incident involving inmate Deonte Hamilton (Inmate #0292567) documented in the incident report beginning on CC 4873 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County

admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

39. Admit that body-worn-camera video of the February 3, 2018 incident involving inmate Joshua Hamm (Inmate #0308827) documented in the incident report beginning on CC 3221 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

40. Admit that surveillance-camera video of the February 3, 2018 incident involving inmate Joshua Hamm (Inmate #0308827) documented in the incident report beginning on CC 3221 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

41. Admit that body-worn-camera video of the August 30, 2018 incident involving inmate Terry Harris (Inmate #0212023) documented in the incident report beginning on CC 3583 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

42. Admit that surveillance-camera video of the August 30, 2018 incident involving inmate Terry Harris (Inmate #0212023) documented in the incident report beginning on CC 3583 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

43. Admit that body-worn-camera video of the November 20, 2017 incident involving inmate James Johnson (Inmate #0262501) documented in the incident report beginning on CC 4033 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

44. Admit that surveillance-camera video of the November 20, 2017 incident involving inmate James Johnson (Inmate #0262501) documented in the incident report beginning on CC 4033 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

45. Admit that body-worn-camera video of the July 19, 2018 incident involving inmate Brian Massimiani (Inmate #0277578) documented in the incident report beginning on CC 3626 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

46. Admit that surveillance-camera video of the July 19, 2018 incident involving inmate Brian Massimiani (Inmate #0277578) documented in the incident report beginning on CC 3626 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

47. Admit that body-worn-camera video of the November 19, 2017 incident involving inmate Joseph McAlpine (Inmate #0261499) documented in the incident report beginning on CC 4060 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

48. Admit that surveillance-camera video of the November 19, 2017 incident involving inmate Joseph McAlpine (Inmate #0261499) documented in the incident report beginning on CC 4060 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

49. Admit that body-worn-camera video of the November 16, 2018 incident involving inmate Deandre McCann (Inmate #0333718) documented in the incident report beginning on CC

5948 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

50. Admit that surveillance-camera video of the November 16, 2018 incident involving inmate Deandre McCann (Inmate #0333718) documented in the incident report beginning on CC 5948 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

51. Admit that body-worn-camera video of the April 28, 2018 incident involving inmate Kenneth McGinnis (Inmate #0303197) documented in the incident report beginning on CC 6221 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

52. Admit that surveillance-camera video of the April 28, 2018 incident involving inmate Kenneth McGinnis (Inmate #0303197) documented in the incident report beginning on CC 6221 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County

admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

53. Admit that body-worn-camera video of the November 12, 2018 incident involving inmate Jasper Muldrow (Inmate #0333565) documented in the incident report beginning on CC 5909 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

54. Admit that surveillance-camera video of the November 12, 2018 incident involving inmate Jasper Muldrow (Inmate #0333565) documented in the incident report beginning on CC 5909 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny as possible match was produced.

55. Admit that body-worn-camera video of the April 4, 2018 incident involving inmate Michael Nugent (Inmate #0285850) documented in the incident report beginning on CC 6108 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

56. Admit that surveillance-camera video of the April 4, 2018 incident involving inmate Michael Nugent (Inmate #0285850) documented in the incident report beginning on CC

6108 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

57. Admit that body-worn-camera video of the February 26, 2018 incident involving inmate Joshua O'Brien (Inmate #0328055) documented in the incident report beginning on CC 3264 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

58. Admit that surveillance-camera of the February 26, 2018 incident involving inmate Joshua O'Brien (Inmate #0328055) documented in the incident report beginning on CC 3264 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

59. Admit that body-worn-camera video of the September 18, 2018 incident involving inmate Bodgan Padus (Inmate #0332325) documented in the incident report beginning on CC 4424 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

60. Admit that surveillance-camera video of the September 18, 2018 incident involving inmate Bodgan Padus (Inmate #0332325) documented in the incident report beginning on CC

4424 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

61. Admit that body-worn-camera video of the September 19, 2018 incident involving inmate Willie Petty (Inmate #0248209) documented in the incident report beginning on CC 4410 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

62. Admit that surveillance-camera video of the September 19, 2018 incident involving inmate Willie Petty (Inmate #0248209) documented in the incident report beginning on CC 4410 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny as possible matches have been produced.

63. Admit that body-worn-camera video of the May 20, 2019 incident involving inmate Jan Plato (Inmate #0304729) documented in the incident report beginning on CC 3800 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

64. Admit that surveillance-camera video of the May 20, 2019 incident involving inmate Jan Plato (Inmate #0304729) documented in the incident report beginning on CC 3800 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

65. Admit that body-worn-camera video of the November 27, 2017 incident involving inmate Jamal Rahmon (Inmate #0326225) documented in the incident report beginning on CC 3918 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

66. Admit that surveillance-camera video of the November 27, 2017 incident involving inmate Jamal Rahmon (Inmate #0326225) documented in the incident report beginning on CC 3918 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

67. Admit that body-worn-camera video of the April 8, 2018 incident involving inmate Chaise Range (Inmate #0315719) documented in the incident report beginning on CC 6357 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

68. Admit that surveillance-camera video of the April 8, 2018 incident involving inmate Chaise Range (Inmate #0315719) documented in the incident report beginning on CC 6357 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/ or control over the above-referenced surveillance camera video.

69. Admit that body-worn-camera video of the October 1, 2018 incident involving inmate Mario Rice (Inmate #0301541) documented in the incident report beginning on CC 4525 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/ or control over the above-referenced body-worn camera video.

70. Admit that surveillance-camera video of the October 1, 2018 incident involving inmate Mario Rice (Inmate #0301541) documented in the incident report beginning on CC 4525 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

71. Admit that body-worn-camera video of the December 6, 2017 incident involving inmate Kwoquan Scott (Inmate #0266174) documented in the incident report beginning on CC 4116 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

72. Admit that surveillance-camera video of the December 6, 2017 incident involving inmate Kwoquan Scott (Inmate #0266174) documented in the incident report beginning on CC 4116 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

73. Admit that body-worn-camera video of the November 6, 2018 incident involving inmate Jimmy Short (Inmate #0207164) documented in the incident report beginning on CC 5925 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

74. Admit that surveillance-camera video of the November 6, 2018 incident involving inmate Jimmy Short (Inmate #0207164) documented in the incident report beginning on CC 5925 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County

admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

75. Admit that body-worn-camera video of the November 29, 2017 incident involving inmate Nicole Smith (Inmate #0322223) documented in the incident report beginning on CC 4069 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

76. Admit that surveillance-camera video of the November 29, 2017 incident involving inmate Nicole Smith (Inmate #0322223) documented in the incident report beginning on CC 4069 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

77. Admit that body-worn-camera video of the March 9, 2018 incident involving inmate Adolphus Sutton (Inmate #0197620) documented in the incident report beginning on CC 4729 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County

admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

78. Admit that surveillance-camera video of the March 9 2018 incident involving inmate Adolphus Sutton (Inmate #0197620) documented in the incident report beginning on CC 4729 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

79. Admit that body-worn-camera video of the August 5, 2018 incident involving inmate James Tell (Inmate #0267188) documented in the incident report beginning on CC 3566 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

80. Admit that surveillance-camera video of the August 5, 2018 incident involving inmate James Tell (Inmate #0267188) documented in the incident report beginning on CC 3566 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County

admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

81. Admit that body-worn-camera video of the May 7, 2019 incident involving inmate David Turner (Inmate #0321186) documented in the incident report beginning on CC 5752 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Deny.

82. Admit that surveillance-camera video of the May 7, 2019 incident involving inmate David Turner (Inmate #0321186) documented in the incident report beginning on CC 5752 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

83. Admit that body-worn-camera video of the December 18, 2017 incident involving inmate Kenneth Vaughn (Inmate #0259898) documented in the incident report beginning on CC 3936 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

84. Admit that surveillance-camera video of the December 18, 2017 incident involving inmate Kenneth Vaughn (Inmate #0259898) documented in the incident report beginning on CC

3936 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

85. Admit that body-worn-camera video of the October 8, 2018 incident involving inmate Matthew Vittardi (Inmate #0316727) documented in the incident report beginning on CC 4344 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

86. Admit that surveillance-camera video of the October 8, 2018 incident involving inmate Matthew Vittardi (Inmate #0316727) documented in the incident report beginning on CC 4344 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

87. Admit that body-worn-camera video of the July 14, 2018 incident involving inmate Jonathan Williams (Inmate #0238832) documented in the incident report beginning on CC 3512 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced body-worn camera video.

88. Admit that surveillance-camera video of the July 14, 2018 incident involving inmate Jonathan Williams (Inmate #0238832) documented in the incident report beginning on CC 3512 does not exist within Defendant Cuyahoga County's possession, custody, and/or control.

ANSWER: Based upon the search described in the Declarations attached to the County's Supplemental Interrogatory Answers, dated March 30, 2023, the County admits that it is not in possession, custody and/or control over the above-referenced surveillance camera video.

Dated: March 30, 2023

Respectfully submitted,

Michael C. O'Malley, Prosecuting Attorney of
Cuyahoga County, Ohio

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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2023, a copy of the foregoing was served via email to all counsel of record: Ashlie Case Sletvold at asletvold@peifferwolf.com and Jessica Savoie at jsavoie@peifferwolf.com.

/s/Janeane R. Cappara
Janeane R. Cappara (0072031)

One of the attorneys for Defendants